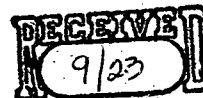


STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER RESOURCES
POST OFFICE BOX 2809
TRENTON, N. J. 08625



*Polish Price
were we involved
in this?*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SEP 21 1977

Theodore A. Schwartz, Esq.
Schwartz, Steinberg, Tobia and Stanziale
141 South Harrison St.
East Orange, N.J. 07108

RECEIVED

SEP 27 1977

Re: Required Pollution Abatement Program
Troy Chemical Corporation Facilities
City of Newark

Director, S&A Division

Dear Mr. Schwartz:

Pursuant to the agreement reached at our August 30, 1977 meeting in this Office, it is the Division's understanding that Troy Chemical Corporation will undertake the following Pollution Abatement Program:

1. Cease discharging all sewage from the office building into Pierson's Creek (tributary to Newark Bay) by connecting the sanitary plumbing to Newark's sewage collection system, and thereby eliminating the existing septic system;
2. Implement the procedure of placing containers beneath all connecting lines during loading and unloading of Troy's chemical bulk storage tanks;
3. Eliminate all discharges into Pierson's Creek by connecting all discharge pipes into Troy's pretreatment unit and then into Newark's sewage collection system; it should be noted that the discharges to Newark's system must comply with the rules and requirements of both Newark and Passaic Valley Sewerage Commissioners;
4. Remove all leaking drums and contaminated soil from Troy's site for disposal in a manner and location approved by this Department's Solid Waste Administration;
5. Provide for proper storage of all raw materials, intermediates, and finished products by installing impervious concrete storage/containment areas with access ramps over the surrounding berms and with manually controlled sumps. Any spillage or leakage of toxic or hazardous substances collected in these storage/containment areas must be disposed of in a manner and location approved by the Department's Solid Waste Administration. Contaminated stormwater not containing toxic or hazardous substances will be sent through Troy's pretreatment unit and then into Newark's sewage collection system in accordance with the rules and requirements of both Newark and Passaic Valley Sewerage Commissioners;

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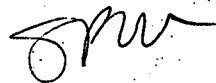


6. Construct impervious containment areas with dikes and floors for Troy's oil and hazardous materials storage tanks, including the fungicide process tank adjacent to Troy's Fungicide Plant; each diked area should be designed to contain the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation, in accordance with the "Federal Register, Vol.38, No.37, Part II;"
7. Install plates or plugs on all floor drains in Troy's warehouse building to prevent the discharge of chemical spillages from the building;
8. Terminate usage of the existing locker room septic system adjacent to Pierson's Creek.

Since you have had three weeks to consider the above points that were discussed at our recent meeting, we anticipate receiving a prompt response with a written commitment and detailed schedule to undertake The Pollution Abatement Program. We also request a clarification of the list of product chemicals which Troy previously submitted as part of its Permit to Locate application so that we may be informed as to the nature of the potential chemical pollutants stored at the site.

We look forward to your cooperation in this matter. Please do not hesitate to call me at (609)292-5262 if you should have any questions.

Very truly yours,



Samuel P. Moulthrop, Esq.
Office Of Regulatory Affairs

E127:G21

cc: Mr. Milton Nowak, Vice President, Troy Chemical Corporation
Mr. Alvin Zach, Director, Department Of Engineering, City of Newark
Mr. Seymour Lubetkin, Chief Engineer, Passaic Valley Sewerage Commissioners
✓ Mr. Pat Griesl, Assistant Chief, Department Of Plumbing, City Of Newark
Mr. William J. Librizzi, Chief, Emergency Response Section, USEPA, Region II